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# MEMO ENDORSED

May 5, 2021

LETTER-MOTION - FILED VIA ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square, Courtroom 619 New York, New York 10007

The request is GRANTED. The conference is adjourned to June 22 at 4pm. Dial-in information will remain the same. It is SO ORDERED.

> Edgardo Ramos, U.S.D.J Dated: 5/5/2021

New York, New York

Werner v. Sell It Social, LLC, et al. (Civil Action No. 1:18-cv-10624-ER) Re: Request for Adjournment of Initial Court Conference

Dear Judge Ramos,

We are counsel of record for Defendants, Sell It Social, LLC and Heath Wolfson, in the above-referenced action. We write to respectfully request adjournment of the Initial Case Management and Scheduling Conference (the "Conference"), currently scheduled for May 13, 2021 at 11:45 a.m. (Dkt. 23).

The basis for this request is that, after the nearly two-year-long pendency of this action prior to the Court's order scheduling the Conference, Defendant Wolfson is currently in the process of arranging for continued representation in this action moving forward, and desires that the Conference be postponed to allow adequate time to seek and secure continued representation before the Conference is held. Undersigned counsel respectfully proposes that the Conference be adjourned for thirty (30) days, or to such other date convenient to the Court.

This is the parties' first request for adjournment of the Conference. The requested adjournment will not affect any other scheduled deadlines or court hearings in this action, as a scheduling order has not yet been entered in this case. Counsel for Plaintiffs, Bruce Bellingham, Esq., has indicated that he does not object to this adjournment request.

Thank you for your time and consideration.

Very truly yours,

Alexander Malbin, Esq. Counsel for Defendants

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